

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION

THE STATE OF TEXAS, et al.,

Plaintiffs,

v.

GOOGLE LLC,

Defendant.

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Civil Action No. 4:20-cv-00957-SDJ

GOOGLE LLC'S CORRECTED APPENDIX A TO
STATUS REPORT FOLLOWING MDL PROCEEDINGS (Dkt. 156-1)

APPENDIX A - PROPOSED SCHEDULE

Deadline	Date	Explanation
Deadline to file motion to dismiss	12/15/2023	
Deadline to file opposition to MTD	1/15/2024	Complex case, so more than 14 days after motion to dismiss (EDTX Local Rule 7(e))
Deadline to file reply in support of MTD	1/31/2024	Complex case so more than 7 days after motion (EDTX Local Rule 7(f))
Close of Fact Discovery	6/28/2024	MDL Deadline from PTO 5 (Dkt. 394)
Plaintiffs' Expert Reports Due	7/12/2024	2 weeks after close of fact discovery; same period as this Court's 2021 Scheduling Order
Google's Expert Reports Due	8/30/2024	7 weeks after opening expert reports; same period as this Court's 2021 Scheduling Order
Plaintiffs' Rebuttal Expert Reports Due	9/27/2024	4 weeks after Google's expert reports; same period as this Court's 2021 Scheduling Order
Close of Expert Discovery	11/8/2024	6 weeks after rebuttal expert reports; same period as this Court's 2021 Scheduling Order
Deadline to file summary judgment motions	12/13/2024	5 weeks after close of expert discovery; same period as this Court's 2021 Scheduling Order
Deadline to file Daubert motions	12/13/2024	5 weeks after close of expert discovery; same period as this Court's 2021 Scheduling Order
Deadline for oppositions to summary judgment and Daubert motions	1/3/2025	3 weeks after opening summary judgment & Daubert motions; same period as this Court's 2021 Scheduling Order
Deadline for replies to summary judgment and Daubert motions	1/17/2025	2 weeks after oppositions to summary judgment & Daubert motions; same period as this Court's 2021 Scheduling Order
Deadline for counsel to contact opposing counsel to determine how they will prepare the joint final pretrial order and jury instructions/verdict form (or proposed findings of fact and conclusions of law)	4/11/2025	12 weeks after replies in support of summary judgment & Daubert motions; same period as this Court's 2021 Scheduling Order

Deadline	Date	Explanation
Deadline to submit video deposition designations	4/18/2025	13 weeks after replies in support of summary judgment & Daubert motions; same period as this Court's 2021 Scheduling Order
Deadline for motions in limine	4/25/2025	1 week after video deposition designation deadline; same period as this Court's 2021 Scheduling Order
Deadline to file Joint Final Pretrial Order	4/25/2025	1 week after video deposition designation deadline; same period as this Court's 2021 Scheduling Order
Deadline for responses to motions in limine	5/9/2025	2 weeks after motions in limine; same period as this Court's 2021 Scheduling Order
Deadline to object to witnesses, deposition extracts, and exhibits in pretrial order	5/9/2025	2 weeks after motions in limine; same period as this Court's 2021 Scheduling Order
Deadline to file Proposed Jury Instructions/Verdict Form (or Proposed Findings of Fact and Conclusions of Law)	5/9/2025	2 weeks after motions in limine; same period as this Court's 2021 Scheduling Order
Deadline to file proposed voir dire questions	5/9/2025	2 weeks after motions in limine; same period as this Court's 2021 Scheduling Order
Hearing on pending motions and objections (if necessary)	TBD by Court	Usually 10 days before final pretrial conference per this Court's 2021 Scheduling Order
Final Pretrial Conference	5/22 & 5/23/2025	13 days after proposed jury instructions; same period as this Court's 2021 Scheduling Order
Jury selection and trial	5/26/2025	Next business day after Final Pretrial Conference; same period as this Court's 2021 Scheduling Order